

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEBRASKA

UNITED STATES OF AMERICA,)	
)	8:13 CR 105
Plaintiff,)	
)	
-vs-)	UNOPPOSED MOTION TO EXTEND
)	TIME TO FILE PRETRIAL MOTIONS
TIMOTHY DEFOGGI,)	
)	
Defendant)	
)	

COMES NOW Timothy DeFoggi, the Defendant herein, by and through his attorney of record, James Martin Davis, and hereby moves the Court for an Order extending the time to file pretrial motions in this case. In support of this Motion, the Defendant shows to the Court that one day prior to the deadline for filing pretrial motions in this proceeding, he has just received an extensive forensic expert's report from the Government relating to the analyses of computers and data storage devices which form the basis of all charges against this Defendant. Therefore, defense counsel will need additional time to review these materials with his client, to retain an independent forensic expert on behalf of the Defendant to conduct his own analyses of the computers and data storage devices, and then determine the pretrial motions that are relevant and necessary in this case. In addition, the Defendant cannot even determine whether a motion to suppress is relevant until those analyses are performed. Finally, the Defendant shows to the Court that defense counsel has consulted with the Government's attorneys in this case who have no objection to this Motion.

WHEREFORE, the Defendant moves the Court for an extension of the deadline for the filing of pretrial motions herein.

Timothy DeFoggi, Defendant,

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CERTIFICATE OF ELECTRONIC FILING

I hereby certify that on November 6, 2013, I electronically filed the foregoing with the Clerk of United States District Court for the District of Nebraska, using the CM/ECF system, which will send notification of such filing to the following:

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s/ James Martin Davis